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July 18, 2005

BY HAND AND ELECTRONIC MAIL

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

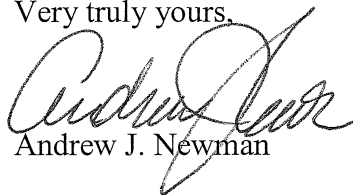
Re: Investigation Into Service Quality Guidelines, D.T.E. 04-116

Dear Secretary Cottrell:

Enclosed please find Blackstone Gas Company's responses to the Second Set of Information Requests of The Department of Telecommunications and Energy To all Gas Local Distribution Companies.

If you have any questions, please contact the undersigned.

Very truly yours,



Andrew J. Newman

AJN/lms

Enclosure

cc: Jody M. Stiefel, Hearing officer (3)  
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**SECOND SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**BLACKSTONE GAS COMPANY  
D.T.E. 04-116**

Question:

DTE-GAS 2-1

Is it feasible to shorten the one hour odor call response time in the SQ Guidelines? Explain.

Response:

A definition of feasible is capable of being done, executed or effected; practicable. Based on this definition the odor response time in the SQ Guidelines is capable of being done in less than one hour. In fact, based on the last three years of data for the Company all odor calls have been responded to within 30 minutes. However, if the standard is reduced from one hour to 30 minutes there will be a greater likelihood that the Company could fail to respond to a call within the reduced period. This may require the Company to incur additional costs to insure compliance with the tighter response guideline. As noted in the response to the possible increase in the odor standard (95%) question, a single failure by the Company would put it into the penalty situation. Thus, if the time period is shortened and the possibility of a penalty is increased, the Company must be allowed to recover additional staffing costs to avoid a penalty. Failure to allow the recovery of these costs would result in a confiscation of the Company's funds. Thus, while it may be feasible to shorten the time requirement it may not be cost effective.

Response to Department of Telecommunications  
and Energy  
Second Set of Information Requests  
Persons Responsible: Legal Counsel

Blackstone Gas Company  
D.T.E. 04-116

**SECOND SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**BLACKSTONE GAS COMPANY  
D.T.E. 04-116**

Question:

DTE-GAS-2-2

Is it feasible to raise the threshold for the percentage of odor calls responded to in less than one hour? Explain.

Response:

The threshold could be increased above the current threshold. However, this would create a problem for the Company if it failed to comply with one odor call in a timely manner. During the last three years the Company has responded to between 8 and 15 odor calls per year. Thus a single call not responded to in a timely manner would mean that the Company has not complied with the current threshold of responding to 95% of the odor calls within the guideline period and make the Company subject to a penalty. Blackstone believes the current threshold as applied to it is unfair and unwarranted and any increase in the threshold would be even more burdensome for a single violation..